

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARIA MOE,

Plaintiff,

v.

Civil Action No. 1:25-cv-10195

DONALD TRUMP, in his official capacity as
President of the United States; JAMES R.
MCHENRY III, in his official capacity as Acting
Attorney General of the United States; WILLIAM
LOTHROP, in his official capacity as Acting
Director of the Federal Bureau of Prisons,

Defendants.

MOTION FOR ADMISSION *PRO HAC VICE* OF AMY WHELAN

Pursuant to Local Rule 83.5.3 Of the Local Rules of Civil Procedure of the United States District Court for the District of Massachusetts, I, Bennett Klein, a member of the bar of this Court and counsel of record for Plaintiff Maria Moe, hereby move that Amy Whelan be granted leave to appear *pro hac vice* before this Court as counsel for Plaintiff in the above-captioned matter. In support thereof, Bennett Klein respectfully submits as follows:

1. I am an attorney in good standing with the Massachusetts Bar and have been licensed to practice law in the Commonwealth of Massachusetts since 1987;
2. Amy Whelan is a member of the bar in good standing in the State of California and has been a member of that bar since February, 2001;
3. Amy Whelan, is a member in good standing of every jurisdiction where she has been admitted to practice law;
4. Amy Whelan, has no disciplinary proceedings pending against her;

5. Amy Whelan, has not previously had a pro hac vice admission (or other limited purpose admission) to this Court revoked for misconduct;

6. Amy Whelan has read and agrees to comply with the Local Rules of the U.S. District Court for the District of Massachusetts.

WHEREFORE, this Court should admit Amy Whelan *pro hac vice* to the bar of this Court.

Dated: January 29, 2025

Respectfully submitted,

/s/ Bennett Klein

Bennett Klein (Bar No. 550702)
Jennifer L. Levi (Bar No. 562298)
Sarah Austin (*pro hac vice* pending)
GLBTQ Legal Advocates & Defenders
18 Tremont Street, Suite 950
Boston, MA 02108
(617) 426-1350
bklein@glad.org
jlevi@glad.org
saustin@glad.org

Christopher F. Stoll (*pro hac vice* pending)
Amy Whelan, Esq. (*pro hac vice* pending)
National Center for Lesbian Rights
870 Market Street, Suite 370
San Francisco, CA 94102
Telephone: 415-365-1320
Facsimile: 415-392-8442
Email: cstoll@NCLRights.org
awhelan@NCLRights.org

Alexander Shalom (*pro hac vice* pending)
Natalie Kraner (*pro hac vice* pending)
Lowenstein Sandler LLP
1251 Avenue of the Americas
New York, NY 10020
(862) 926-2029
ashalom@lowenstein.com
nkraner@lowenstein.com

CERTIFICATE OF SERVICE

I, Bennett Klein, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: January 29, 2025

/s/ Bennett Klein
Bennett Klein